

THE COCHRAN FIRM

MISSISSIPPI DELTA

306 BRANSCOME DRIVE • GRENADA, MISSISSIPPI 38901

TELEPHONE: (662) 227-9940 • FAX: (662) 227-9941

WWW.COCHRANFIRM.COM

August 12, 2019

Via Certified Mail

Mayor Mario King
4320 McInnis Avenue
Moss Point, MS 39563

City of Moss Point
Attn: Stephanie Coleman, City Clerk
4320 McInnis Avenue
Moss Point, MS 39563

Officer Lancen Shipman
4200 Bellview Avenue
Moss Point, MS 39563

RE: Keena Sims, Individually and on behalf of all Heirs-At-Law and Wrongful
Death Beneficiaries of Toussaint Diamon Sims, Deceased and The Estate
of Toussaint Diamon Sims, Deceased – Notice of Claim

Date of Injury: 08/08/2019

To Whom It May Concern:

Please be advised that The Cochran Firm – MS Delta has been retained to represent Keena Sims, Individually and on behalf of all Heirs-at-Law and Wrongful Death Beneficiaries of Toussaint Diamon Sims, Deceased and the Estate of Toussaint Diamon Sims, Deceased in their claims against Mayor Mario King, City of Moss Point, Chief Brandon Ashley, and Officer Lancen Shipman for injuries/damages Mr. Sims sustained on or about August 8th, 2019 in Moss Point, MS. Mr. Sims was located in Pascagoula, MS, and pursued through Moss Point, MS where his vehicle was shot to the point of disabling the driving ability near 2nd Street in Moss Point, MS. Thus, Mr. Sims exited his vehicle and proceeded to flee on foot. During the entire ordeal, Mr. Sims was unarmed and posed no imminent threat to the well-being of police officers as he fled from them. Mr. Sims was able to jump one fence before he was shot four to five times in the back by Officer Shipman. To date, the family of Toussaint Diamon Sims has no information on the cause of pursuit for Mr. Sims. As a result of all the aforementioned Defendants' actions, Mr. Sims sustained severe physical injuries and damages, which caused him to expire on August 8th, 2019. Other claims against said defendants include but are not limited to constitutional violations, gross negligence, negligent/intentional infliction of emotional distress, reckless disregard, excessive force, and negligent/gross negligent supervision, hiring, training, and retention of the officers/individuals in question.

My client suffered and continues to suffer monetary losses from the injuries including mental and emotional pain and anguish. My client hereby demands \$10,000,000 from City of Moss Point, MS, Chief Brandon Ashley, and Officer Lancen Shipman for both compensatory and punitive damages. At the time of the injuries, my client was a resident citizen of Jackson County, Mississippi and is currently a resident of Jackson County, Mississippi.

Please forward this notice of claim to your liability carrier, and have said carrier contact me as soon as possible.

Sincerely,

THE COCHRAN FIRM – MS Delta

A handwritten signature in cursive script, appearing to read "Carlos E. Moore".

Carlos E. Moore, Esq.

Cc: client